

Exhibit A

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT))
 ANTITRUST LITIGATION,)
) Case No. 07-5944 SC
) MDL No. 1917
 This Document Relates to:)
)
 ALL ACTIONS.)
)

HIGHLY CONFIDENTIAL

VOLUME I

DEPOSITION of NOBUO HARADA

May 20, 2015

Tami L. Le, RPR, CSR No. 8716
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09:21

1

SAORI BEZOUSKA,

2

sworn to interpret from English into

3

Japanese and from Japanese into English

4

to the best of his or her ability.

5

6

MR. CURRAN: May I proceed?

7

8

EXAMINATION

9

BY MR. CURRAN:

09:21

10

Q Mr. Harada, good morning.

11

A (In English) Good morning.

12

Q Mr. Harada, are you currently employed?

13

A (Through the Interpreter) Yes.

14

Q And by whom?

09:22

15

A I work for SEMA Sharp Electronic Manufacturing

16

Companies.

17

Q Where do you work?

18

MR. BENSON: Objection to form.

19

THE DEPONENT: In San Diego.

09:22

20

Q BY MR. CURRAN: Mr. Harada, when did you first

21

start working for any company in the Sharp family of

22

companies?

23

A Well, 1973.

24

Q Okay. And with what company was that?

09:23

25

A Sharp Corporation.

10:14 1 THE DEPONENT: It was a business of
2 manufacturing or -- color TVs.

3 Q BY MR. CURRAN: And what was the business of
4 SEMEX at that time?

10:14 5 A SEMEX was TV production.

6 Q Color televisions; correct?

7 A Yes, color.

8 Q So at that point in time, 2001, SEMA and SEMEX
9 were in the same line of business?

10:15 10 MR. BENSON: Objection to form, misstates prior
11 testimony.

12 THE DEPONENT: Well, I'm not sure about same
13 line of business, but the relationship between SEMA and
14 SEMEX was that SEMEX was a manufacturing plant and SEMA
10:15 15 was the owner of what was produced by SEMEX, and they
16 would then sell it on to sales and marketing.

17 Q BY MR. CURRAN: Sell it on to sales and
18 marketing at SEC?

19 A Yes.

10:16 20 Q And how -- were televisions still being
21 manufactured at SMCA in 2001?

22 A No manufacturing since April of 2001.

23 Q Did SEMA and SEMEX replace SMCA?

24 THE INTERPRETER: Excuse me.

10:17 25 MR. BENSON: Objection to form, vague.

10:17 1 THE DEPONENT: Replaced, yes.

2 Q BY MR. CURRAN: Do you know why SMCA was closed
3 down?

4 MR. BENSON: Objection to form, misstates prior
10:17 5 testimony.

6 THE DEPONENT: It was transferred. The TV
7 business is transferred for Mexico. It wasn't closed
8 down. The SMCA still had its microwave oven business.

9 Q BY MR. CURRAN: Okay. So SEMA and SEMEX
10:18 10 replaced SMCA's television manufacturing; is that right?

11 A It was transferred.

12 Q Do you know why the television manufacturing
13 was transferred from SMCA to SEMA/SEMEX?

14 A It's because S- -- the -- there was weaker
10:19 15 competitive -- strike that -- because in the U.S., SMCA
16 was losing its competitiveness.

17 Q Do you know why SMCA was losing its
18 competitiveness?

19 A There were two reasons; the first was that the
10:20 20 labor was much -- was higher in the United States
21 compared to Mexico, and the second was that most part
22 suppliers had already moved to Mexico.

23 Q Were either of those two reasons, were -- among
24 those two reasons, was one more important than the
10:20 25 other?

10:20 1 MR. BENSON: Objection to form, vague.

2 THE DEPONENT: No. Both were important
3 factors.

4 Q BY MR. CURRAN: How much cheaper was the labor
10:21 5 in Mexico than in Memphis?

6 MR. BENSON: Objection to form, lack of
7 foundation.

8 THE DEPONENT: I don't remember exactly, but I
9 think for a line worker, it was maybe about a third.

10:21 10 Q BY MR. CURRAN: So the cost of labor in Mexico
11 for a line worker was one-third the wage of the worker
12 in Memphis?

13 A I don't remember exactly, but I think it was
14 that or less.

10:22 15 Q And you were the head of manufacturing in
16 Memphis, right, immediately before the transfer?

17 A Yes.

18 Q And, sir, did you have any input into the
19 decision to replace the television manufacturing at SMCA
10:22 20 with the television manufacturing at SEMA/SEMEX?

21 MR. BENSON: Objection -- sorry. Objection to
22 form, misstates prior testimony.

23 THE DEPONENT: I was involved.

24 Q BY MR. CURRAN: How were you involved?

10:24 25 A The pres- -- the then president of SEMA and

10:26 1 Q And for how long were you president of SEMA and
2 SEMEX?

3 A Until March 2008.

4 Q Did you take on a new position then?

10:26 5 A I was transferred to the plant in Poland from
6 April 2008.

7 Q Is that a television manufacturing plant?

8 A It was originally an LCD panel module assembly
9 plant, then it turned into a plant that manufactured the
10:27 10 television through the end.

11 Q LCD televisions or cathode ray tube
12 televisions?

13 A LCD TVs.

14 Q How long were you working in Poland?

10:28 15 A Four years.

16 Q What was your title?

17 A In Poland?

18 Q Yes.

19 A President.

10:28 20 Q And what was the company you were working for
21 at that point in time?

22 A Sharp Manufacturing of Poland.

23 Q And so you worked as president of Sharp
24 Manufacturing of Poland from approximately April of '08
10:29 25 for four years; right?

10:29 1 A Yes.

2 Q During that point in time, was Sharp still
3 manufacturing color televisions at the plant in
4 Barcelona, Spain?

10:29 5 MR. BENSON: Objection to form, vague.

6 THE DEPONENT: Color -- Spain -- the Spain
7 plant was not manufacturing color TVs, they were
8 manufacturing LCD TVs.

9 Q BY MR. CURRAN: While you were in Poland?

10:30 10 A CRT TVs were no longer being manufactured by
11 the time I was in Poland.

12 Q Were LCD televisions being manufactured in
13 Barcelona, Spain even after Sharp Manufacturing of
14 Poland was manufacturing LCD televisions?

10:31 15 A Basically, the TV manufacturing was transferred
16 from Barcelona to Poland.

17 Q So the -- the Poland plant replaced the
18 Barcelona plant; right?

19 MR. BENSON: Objection to form,
10:31 20 mischaracterizes prior testimony.

21 THE DEPONENT: Ultimately, the LCD TV
22 manufacturing was consolidated into Poland.

23 Q BY MR. CURRAN: It closed down in Spain and it
24 started up and continued from Poland; right?

10:32 25 MR. BENSON: Objection to form, asked and

11:00 1 discussion about looking at the cost level.

2 Q BY MR. CURRAN: What did you do after you were
3 president of Sharp Manufacturing of Poland?

4 THE INTERPRETER: Can the interpreter just look
11:01 5 something up?

6 CHECK INTERPRETER SUMIYOSHI: Commissioned
7 employee, a contract employee.

8 THE INTERPRETER: Thank you.

9 THE DEPONENT: I retired from Sharp Corporation
11:01 10 in 2011, then continued for two years as the president
11 of Poland as a part-time employee -- or a commissioned
12 employee and then worked for Sharp Corporation for an
13 additional two years as a commissioned employee.

14 Q BY MR. CURRAN: So let me see if I understand
11:01 15 this. So you retired from Sharp Corporation in 2011?
16 That's the first question.

17 A Yes.

18 Q But you stayed at Sharp Manufacturing of Poland
19 for two more years as a part-time, commissioned
11:02 20 employee?

21 A Yes.

22 Q And were you working in Poland during that
23 period?

24 A Yes, the same.

11:02 25 Q And were you still the president of Sharp

11:02 1 Manufacturing of Poland?

2 A Yes.

3 Q So you were president of the company even
4 though you were a part-time, commissioned employee?

11:03 5 A I think really part-time is wrong. This --
6 what I was was a contract employee, a contract job, and
7 it's the same as being a regular employee, the
8 conditions were the same. It was just that I had
9 retired at one point and then I -- I retired and then
11:04 10 returned as this contract employee, so I was working
11 full-time. I don't think that we -- you really have
12 that type of a system in the United States.

13 Q And then after two years as a contract employee
14 at Sharp Manufacturing of Poland, did you move back to
11:04 15 Japan?

16 A Yes, I did.

17 Q And you worked as a contract employee for Sharp
18 at that time?

19 A I worked as a contract employee for Sharp
11:05 20 Corporation.

21 Q Okay. And what were your responsibilities?

22 A For the first year, I was project chief for a
23 new plant that was being commissioned in Indonesia for
24 white goods and I -- so I supported that as a project
11:05 25 chief.

11:05 1 Q And white goods, meaning refrigerators,
2 washers, dryers?

3 A (In English) Yes.

4 (Through the Interpreter) The new plant in
11:06 5 Indonesia was a plant for refrigerators and washing
6 machines.

7 Q No television manufacturing?

8 A There was some TV too.

9 Q LCD or CRT television?

11:06 10 A LCD.

11 Q And what about the second year with Sharp
12 Corporation?

13 A I was in the overseas planning department --
14 overseas site planning department and essentially I was
11:07 15 following up from Japan on the new plant -- mainly
16 the -- mainly the new plant in Indonesia.

17 Q Okay. So you retired in 2011 and then you were
18 a contract employee for four years; right?

19 A Yes.

11:08 20 Q Was that a single contract or multiple
21 contracts covering that four years?

22 A It was renewed each year.

23 Q Four back-to-back contracts?

24 A So four year -- for the span of four years,
11:08 25 each year the contract was renewed.

11:08 1 Q Right. With no gap in between?

2 A Gap?

3 Q Yeah, no hiatus, no interregnum.

4 A No.

11:09 5 Q All right. And then what did you do after the
6 fourth of those one-year contracts?

7 A That ended on January 21st of this year.

8 Q What did you do then?

9 THE INTERPRETER: Can the interpreter check the
11:10 10 gender?

11 MR. CURRAN: Yes.

12 THE DEPONENT: Then the president, Okayama,
13 from SEMA said -- asked me whether -- invited me to work
14 with him.

11:10 15 Q BY MR. CURRAN: And did you accept that
16 invitation?

17 A Yes, I did.

18 Q And when did you start working with SEMA again?

19 A March 24th of this year.

11:10 20 Q Were you employed between January 21st of this
21 year and March 24th of this year?

22 A No, I was not.

23 Q So you've now been working again at SEMA for
24 the past two months?

11:11 25 A Yes, that's correct.

11:53 1 THE DEPONENT: Sharp and Sony, of course, are
2 competitors, but in the Maquiladora Association, there
3 wasn't really a feeling that --

4 THE INTERPRETER: I'm sorry.

11:53 5 THE DEPONENT: -- in the Maquiladora
6 Association, there wasn't really that kind of a
7 sentiment.

8 Q BY MR. CURRAN: Can you explain what you mean
9 by that?

11:54 10 A (In English) I cannot explain very well, but...

11 (Through the Interpreter) The -- the companies
12 certainly were competitors, but more than that -- how
13 should I say this? I can't express it very well. But
14 they are competitors, but -- of course, they're
11:55 15 competitors, so we did not discuss or exchange
16 work-related information, but more than that, our
17 relationship was as members of the Maquiladora
18 Association.

19 Q So you did not exchange work-related
11:55 20 information with the other Japanese TV makers who were
21 in the association?

22 A No.

23 Q Why not?

24 A That's because there was also the issue of
11:56 25 antitrust too, so we did -- nobody talked about that

11:56 1 type of thing.

2 Q And what do you mean by "work-related
3 information"? What are the types of information that
4 you did not discuss with these competitors?

11:56 5 A That I did not discuss?

6 Q Yes. I think that's what your testimony was;
7 right?

8 A Well, work-related information, for example,
9 price or part sourcing -- part sourcing and such --
11:57 10 such -- the cost -- information on cost was never
11 discussed.

12 Q So you did not discuss information related to
13 the price of televisions with these competitor
14 companies; is that right?

11:57 15 A That is right.

16 Q Did you discuss production with these other
17 companies?

18 MR. BENSON: Objection to form, vague.

19 THE DEPONENT: Detailed discussions about
11:58 20 productions was not done with others.

21 Q BY MR. CURRAN: What do you mean by "detailed"?

22 A We wouldn't discuss things like the scale of
23 production or the daily production output, the employee
24 attendance rate, wages, things like that. We would only
11:59 25 talk about whether we're busy or not, something like

11:59 1 that.

2 Q What about monthly production output?

3 A We would only say approximately what it was.

4 Q In what discussions would this come up?

11:59 5 A It doesn't come up in meetings.

6 Q When does it come up?

7 A So, we don't talk about it. Those more
8 detailed topics or detail items would not come up.

9 Are you talking about what the approximate
12:00 10 scale is?

11 Q When -- in what context did you have
12 discussions about general production output?

13 MR. BENSON: Objection to form,
14 mischaracterizes prior testimony.

12:00 15 THE DEPONENT: So it would come up in the
16 context of talking about if it's -- if things are, in
17 general, going well or not.

18 Q BY MR. CURRAN: So just social chitchat, is
19 that what you're saying?

12:01 20 A Yes.

21 Q Did you discuss market trends with your
22 competitors in the association?

23 MR. BENSON: Objection to form, vague.

24 THE DEPONENT: The actual sales and projections
12:01 25 for North America overall would be included in the

12:01 1 topics, so that would come up.

2 Q BY MR. CURRAN: In the topics at the regular
3 meetings?

4 A Well, that would depend on what the topic being
12:02 5 addressed for a specific meeting was. It wasn't that it
6 was regularly brought up.

7 Q But sometimes at the association meetings,
8 there would be a discussion of actual sales and
9 projections for North America?

12:02 10 A That would be discussed based on information
11 that has been made public through the media.

12 Q And by "projections," you're talking about for
13 the future; right?

14 A Yes, that would also be in the actual.

12:03 15 Q So is it -- is it your testimony that the only
16 figures that were discussed at the association meetings
17 were those that had already been made public in the
18 media already?

19 A Yes. That is the only information source there
12:03 20 was for the U.S. as a whole.

21 Q But at association meetings or social events,
22 did you and the other Japanese TV makers share
23 confidential information about pricing, plans,
24 production, forecasts and other items like that?

12:04 25 A No, we did not, because those were our -- those

12:04 1 were secret -- our individual secrets, so we did not.

2 Q Did you ever ask some of the competitor
3 companies to give you their confidential information on
4 pricing, production, technological advances or other
12:05 5 confidential matters?

6 A No, I did not.

7 Q Did you ever ask subordinates of yours at
8 SEMA/SEMEX to try to obtain confidential pricing,
9 production or other confidential materials from
12:05 10 competitor companies?

11 A No, I did not.

12 Q Did you ever provide reports to either SEC or
13 top management at Sharp Corporation that included
14 confidential information gathered by your subordinates
12:06 15 from competitors?

16 A No.

17 Q All right. Now I want to step away from the
18 Maquiladora Association for a minute and talk kind of
19 more generally. Okay?

12:06 20 Separate and apart from the association, did
21 you have communications with competitors in which you
22 exchanged pricing information, production information or
23 other confidential competitive information?

24 A No, I did not.

12:07 25 Q Did you ever ask subordinates of yours at SEMA

12:07 1 and SEMEX to contact competitor companies and attempt to
2 gather confidential pricing, production or other
3 confidential material?

4 A Do you mean competitor information?

12:08 5 Q Yes.

6 A I would ask for information to be obtained
7 through suppliers.

8 Q Did you ever ask your subordinates to obtain
9 that information directly from competitors?

12:08 10 A No.

11 Q Did you ever have email exchanges with your
12 subordinates in which you asked them to get information
13 from competitor companies and then they responded and
14 gave you such confidential information from competitors?

12:09 15 MR. BENSON: Objection to form, asked and
16 answered.

17 THE DEPONENT: No.

18 Q BY MR. CURRAN: Did you actively monitor what
19 your competitors at the -- well, I'm not limiting it to
12:09 20 the Japanese, so this is for any of the competitors.
21 Did you monitor what your competitors were doing with
22 respect to manufacturing of televisions?

23 MR. BENSON: Objection to form, vague.

24 THE DEPONENT: I don't know about actively, but
12:10 25 we wanted to know what the scale of production of other

12:10 1 companies was, so we did try to obtain that through
2 suppliers.

3 Q BY MR. CURRAN: But not directly from
4 competitor companies?

12:11 5 MR. BENSON: Objection to form, asked and
6 answered.

7 THE DEPONENT: No.

8 Q BY MR. CURRAN: Did you provide reports to SEC
9 or Sharp Corporation in Japan about competitor
12:11 10 activities that you and your subordinates had gathered
11 up?

12 MR. BENSON: Objection to form, vague and
13 compound.

14 THE DEPONENT: In regards to the number of
12:12 15 units produced by competitor and television
16 manufacturing was obtained through supply -- through a
17 supplier or suppliers and --

18 (In English) Part supplier. Part supplier.

19 (Through the Interpreter) -- part suppliers,
12:12 20 and, although irregularly, reports were provided to
21 inform what the approximate scale was.

22 Q BY MR. CURRAN: Did you receive reports or
23 other information from SEC about developments in the
24 competitive landscape for televisions?

12:13 25 MR. BENSON: Objection to form, vague.

12:13 1 THE DEPONENT: I don't know what type of
2 information that would be, but basically it was not very
3 frequent that -- or it was seldom that information on
4 other companies would be provided by SEC. Of course, we
12:14 5 would exchange information that has already been in the
6 news that is public, but we did not receive confidential
7 information.

8 Q BY MR. CURRAN: To the best of your knowledge,
9 did SEC have direct interactions with competitor
12:14 10 companies that were also selling televisions?

11 MR. BENSON: Objection to form, vague and lack
12 of foundation.

13 THE DEPONENT: I don't really know.

14 Q BY MR. CURRAN: Did you ever hear that SEC had
12:14 15 developed contacts or channels with its competitors to
16 exchange information?

17 MR. BENSON: Objection to form, vague.

18 THE DEPONENT: As far as I know, I haven't
19 heard of that.

12:15 20 Q BY MR. CURRAN: Did you instruct your
21 subordinates at SEMA and SEMEX to develop channels with
22 competitors in order to exchange information?

23 MR. BENSON: Objection to form, asked and
24 answered.

12:15 25 THE DEPONENT: No, I did not.

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SAN FRANCISCO DIVISION

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09:06 1 again?

2 THE REPORTER: It's your call.

3 MR. CURRAN: Can the interpreters acknowledge
4 on the record that they understand they're under oath
09:06 5 still.

6 THE INTERPRETER: I do.

7 CHECK INTERPRETER SUMIYOSHI: I do.

8 CHECK INTERPRETER BEZOUSKA: I do.

9 MR. CURRAN: And can the witness acknowledge as
09:06 10 well that he understands he's under oath.

11 THE DEPONENT: Yes.

12 MR. CURRAN: Okay. May we proceed?

13 MR. BENSON: Yes.

14

09:07 15 KOKO PETERS,

16 TERESA SUMIYOSHI

17 and SAORI BEZOUSKA

18 were previously sworn to interpret from
19 English into Japanese and from Japanese
09:21 20 into English to the best of their
21 ability.

22

23 NOBUO HARADA,

24 having been previously duly sworn, was
09:07 25 examined and testified as follows:

11:46 1 MR. BENSON: Objection to form, asked and
2 answered.

3 THE DEPONENT: CRTs were also, of course,
4 included.

11:47 5 Q BY MR. CURRAN: And particularly color picture
6 tubes or CPTs; right?

7 A Well, we called them CRTs, but we were buying
8 CRTs.

9 Q Okay. And, sir, while you were president of
11:47 10 SEMA and SEMEX -- and before that, I guess when you were
11 president of SCMA --

12 MR. BENSON: SMCA.

13 MR. CURRAN: SMCA, thank you.

14 Q -- were you involved in the procurement process
11:48 15 for the acquisition of contracts?

16 MR. BENSON: Objection to form, vague,
17 compound.

18 THE DEPONENT: Well, I was president for both
19 companies and, of course, it depends on the degree to
11:48 20 which "involvement" is meant; however, because, as
21 president, I was responsible for everything, the
22 question of whether I was involved or not would result
23 in an answer of yes.

24 Q BY MR. CURRAN: And, in fact, you personally
11:49 25 participated in negotiations with CRT suppliers; right?

11:49 1 A Well, when I was at SMCA in Memphis, I was
2 hardly involved.

3 Q And what about when you were president of SEMA
4 and SEMEX?

11:50 5 A When I was at -- when I was president of
6 SEMA/SEMEX, I was -- I participated together with the
7 general manager for procurement.

8 Q And you personally were involved in
9 negotiations with suppliers for CRTs; right?

11:50 10 A Well, I'm not sure about the term "personally,"
11 but I participated in the meetings as a representative
12 of the company.

13 Q Okay. What I mean "personally," and I don't
14 mean as an individual unaffiliated with the company, I
11:51 15 mean you, yourself, participated on behalf of SEMA and
16 SEMEX in negotiations with suppliers for CRTs.

17 MR. BENSON: Objection to form, vague, asked
18 and answered.

19 THE DEPONENT: Well, you make it sound as
11:52 20 though I negotiated alone, but negotiations that I was
21 involved with always included the general manager for
22 procurement and purchasing.

23 Q BY MR. CURRAN: Okay. But you personally
24 attended negotiation sessions with suppliers; correct?

11:52 25 MR. BENSON: Objection to form, asked and

11:52 1 answered, argumentative.

2 THE DEPONENT: I did attend.

3 Q BY MR. CURRAN: And you, yourself, had
4 negotiations by email with CRT suppliers; right?

11:53 5 MR. BENSON: Objection to form, vague.

6 THE DEPONENT: I don't remember whether I
7 myself directly sent an email or not.

8 Q BY MR. CURRAN: Do you -- well, who were the
9 CRT suppliers to SEMA -- to SEMA and SEMEX?

11:53 10 MR. BENSON: Objection to form,
11 mischaracterizes prior testimony.

12 THE DEPONENT: There are several companies.

13 Q BY MR. CURRAN: Please name them.

14 A Thomson, Hitachi, Toshiba, Samsung and -- who
11:55 15 else was there? -- Orion -- did I say Toshiba? -- LG. I
16 think it's around those. Oh, and also Matsushita.

17 Q Was LG Philips one?

18 A Yes.

19 Q What about Philips alone?

11:55 20 MR. BENSON: Objection to form, vague.

21 THE DEPONENT: (In English) Philips alone,
22 Philips alone, I don't remember. I remember, I believe,
23 Philips, but...

24 (Through the Interpreter) Philips alone, I
11:56 25 don't remember. I do remember LG Philips.

12:11 1 through technical collaboration with the TV side as
2 well.

3 Q "The TV side" meaning SEMA, SEMEX and other TV
4 manufacturers?

12:12 5 A No, that's not what I mean. What I'm trying to
6 say is the Japanese-side technology.

7 Q TV makers in Japan?

8 A The engineering department or division for
9 television in Japan.

12:12 10 Q Okay. All right. And then the second point
11 you referred to before were improvements by
12 manufacturers. Can you explain that, please?

13 A This decrease in cost based on efforts by the
14 CRT manufacturers to improve things.

12:13 15 Q Can you give some examples of that?

16 A Well, there are changing of processes or
17 automating processes.

18 Q And are these things done at the manufacturing
19 plants of the CRT makers?

12:14 20 MR. BENSON: Objection to form, lack of
21 foundation.

22 THE DEPONENT: That's correct.

23 Q BY MR. CURRAN: And then, sir, the third point
24 you refer to had to do with getting quotations from the
12:14 25 CRT makers; is that right?

12:14 1 A Yes.

2 Q Can you explain that one, please?

3 A Depending -- by specific category, if a
4 particular category had multiple production suppliers,
12:15 5 then we would issue a request to them, to those multiple
6 suppliers, saying that if it's for the first six months,
7 asking what the price would be for the October-March
8 period and inform them of what the volume would be.

9 Q And then in that event, would you obtain
12:15 10 quotations from a variety of different suppliers?

11 A Yes.

12 Q And then you would pick the lowest of those?

13 A Yes.

14 Q Were you able to get multiple suppliers
12:16 15 approved for most of the television sets you were
16 manufacturing?

17 A Yes.

18 Q Did you sometimes go -- go back to a supplier
19 who had made a quotation and ask them to lower it?

12:17 20 A Yes.

21 Q And when you did that, did sometimes you say
22 that another supplier had given a quotation that was
23 lower than theirs?

24 MR. BENSON: Objection to form, vague.

12:17 25 THE DEPONENT: We didn't really say it in that

12:17 1 way. What we said really was more along the line of,
2 "That doesn't really meet our target, so please lower
3 it."

4 Q BY MR. CURRAN: Mr. Harada, what do you mean by
12:18 5 your target?

6 A When a management plan is drafted, the sales
7 price from SEMA to SEC is set. And based on that, we
8 establish a target of what the CRT price would be and
9 what our profit will be, so that would be our target.

12:19 10 Q Sir, that was -- by the target price, that was
11 what SEMA hoped or expected to be able to purchase the
12 CRTs for?

13 A Yes.

14 CHECK INTERPRETER SUMIYOSHI: Earlier in the
12:19 15 translation, you said the price from SEMA to -- okay.
16 It was a transcription. Got it.

17 THE INTERPRETER: Okay.

18 Q BY MR. CURRAN: Mr. Harada, did you try to play
19 one supplier's quotation off of another in order to
12:20 20 drive the prices down?

21 MR. BENSON: Objection to form, vague.

22 (Reporter seeks clarification.)

23 CHECK INTERPRETER SUMIYOSHI: The witness said
24 "I don't understand what you mean by 'play off,'" and
12:20 25 then the check interpreter offered the term "compete."

13:55 1 other day I go to the plant in Mexico.

2 Q Why do you divide your time up that way now?

3 MR. BENSON: Objection to form, vague.

4 THE DEPONENT: My current work is to get new
13:56 5 businesses for SEMEX and it is -- it works out better to
6 be in the United States in order to cultivate new
7 business, so that is the reason why I am not in the U.S.
8 side.

9 Q BY MR. CURRAN: All right. Your job is to get
13:57 10 new business for SEMEX, not SEMA?

11 A Well, it will end up being the same thing,
12 but...

13 Q How long is your contract for?

14 A The contract doesn't really have an end date.

13:57 15 Q Do you have an expectation as to how long your
16 contract will last?

17 MR. BENSON: Objection to form, vague.

18 THE DEPONENT: Well, that would depend on what
19 happens, but I think it is for around a year.

13:58 20 Q BY MR. CURRAN: Is it a written contract, sir?

21 A Yes.

22 Q When did you sign it?

23 A I think it was in March, around one week before
24 I came to the U.S.

13:59 25 Q When did you come to the U.S.?

13:59 1 A It was March 24th.

2 Q Where are you living?

3 A I'm currently living in a town called Chula
4 Vista.

13:59 5 Q Can you please give me the address?

6 A 825 East Paloma (sic), Unit 503, Chula Vista
7 91911.

8 Q You have the zip code memorized already?

9 A Yes.

14:00 10 Q That's impressive.

11 MR. CURRAN: At this time I'd like to ask the
12 court reporter to mark another document.

13 It's a previously marked document so we don't
14 need that. It's been previously marked as Exhibit 3620
14:00 15 and Exhibit 3620E. I'll read the Bates number anyway,
16 SHARP-CRT-00212452 through -476.

17 (Document handed to counsel and the deponent.)

18 Q BY MR. CURRAN: So, Mr. Harada, of course
19 please take a moment to familiarize yourself with 3620
14:01 20 and then I'll ask you some questions about it.

21 A (Reviewing document.)

22 Yes.

23 Q Mr. Harada, what is this document?

24 MR. BENSON: Objection to form, lack of
14:03 25 foundation.